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U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
WEST DIV. CINCINNATI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

	)	CASE NO. C-1-01-0021
	)	
	)	
JAN ALBERT CREUSERE,	)	
Plaintiff,	)	Judge Beckwith
	)	
vs.	)	
	)	
OHIO AND VICINITY REGIONAL	)	
COUNCIL OF CARPENTERS,	)	
et al.	)	
Defendants,	)	
-----	)	

**MOTION TO ENLARGE  
NUMBER OF DEPOSITIONS  
TO AT LEAST TWENTY**

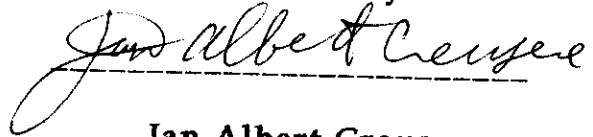
**Introduction:**

On November 5, 2003 and various communications since Plaintiff and Defendants have reached an agreement on Report of the Parties in the above captioned case and the Defendant's Counsel has filed the Report electronically on November 24, 2003. Under # 6 (3) the report states "under Fed. R. Civ. P. or the S.D. Ohio Civ. Rules, including the .....limitation of ten (10) depositions, each lasting no more than one seven-hour day," Plaintiff has established at least twelve people will need to be deposed for at least two of the claims and more (different) people will need to be deposed for the other two claims. At the present time Plaintiff anticipates at least twenty depositions need to be taken. Therefore, the following Motion is tendered:

**MOTION**

In light of the above facts Plaintiff respectfully requests permission by the Court to depose at least twenty people in the above captioned case.

Respectfully submitted this 25th day of November, 2003 by



Jan Albert Creusere  
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**Certificate of Service**

I, Jan Albert Creusere, Plaintiff *pro se*, hereby attest and affirm that a true and accurate copy of the above Motion to Enlarge was sent to Fred Seleman, Counsel for the Defendants, c/o Ulmer & Berne, LLP, Penton Media Building, 1300 East Ninth Street, Suite 900, Cleveland, OH 44114, via regular first class mail, postage prepaid, on this 25th day of November, 2003.



Jan Albert Creusere